

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

MICHAEL MOATES, DC CHRONICLE,
and DC CHRONICLE LIMITED,

Plaintiffs,

v.

FACEBOOK, INC. AND AT&T INC.,

Defendants.

Case No. 4:21-cv-00694

STIPULATION REGARDING DEADLINES RELATED TO REMOVAL AND REMAND

Plaintiffs Michael Moates, DC Chronicle and DC Chronicle Limited (“Plaintiffs”), and Defendant Facebook, Inc. (“Defendant”), together (“Parties”) by and through their undersigned counsel hereby stipulate as follows:

- a. Defendant Facebook, Inc. has removed this case from state court, and Plaintiffs plan to file a motion to remand;
- b. The Parties agree that all responsive pleadings and other deadlines are tolled until a specified time after this Court rules on Plaintiffs’ forthcoming motion to remand, as detailed herein;
- c. Plaintiffs shall have until Thursday, October 7 to file a motion to remand;
- d. Defendant Facebook, Inc. shall have until Thursday, October 28 to file a response to Plaintiffs’ motion to remand;
- e. Plaintiffs shall have until Thursday, November 11 to file any reply in support of Plaintiffs’ motion to remand; and

Exhibit

A

f. Promptly following the Court's resolution of Plaintiffs' motion to remand, the Parties will meet and confer regarding a briefing schedule for further pleadings and motions (including potential motions to dismiss and/or transfer, and a potential motion to amend the complaint by Plaintiffs), but in the interim the Parties agree that in no event shall Facebook, Inc. be required to answer or respond to Plaintiffs' Complaint (whether in this Court or state court) until at least 21 days following this Court's order resolving Plaintiffs' motion to remand.

It is so stipulated.

Dated: September 9, 2021

Respectfully submitted,

By: /s/ Allison Jacobsen
Allison Jacobsen
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Attorney for Defendant FACEBOOK, INC.

By: /s/ Michael Moates
Michael Moates, *pro se*
2700 Colorado Blvd., No. 1526
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Pro se Plaintiff

IT IS SO ORDERED this _____ day of _____, 2021.

BY THE COURT: